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ONS-2017-059

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Washington, DC 20555

10 CFR 50.54(f)

Duke Energy Carolina, LLC (Duke Energy)
Oconee Nuclear Station (ONS), Unit 1, 2 and 3
Docket Numbers 50-269, 50-270, 50-287
Renewed License Numbers DPR-38, DPR-47, and DPR-55

Subject: Response to March 12, 2012 Request for Information, Recommendation 2.1, Flooding, Required Response 3, Flooding Focused Evaluation Summary

References:

1. NRC Letter, *Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Recommendations 2.1, 2.3, and 9.3, of the Near-Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 12, 2012 (Accession No. ML12053A340).
2. Duke Energy Letter, *Revised Flood Hazard Reevaluation Report per NRC's Request for Additional Information*, dated March 6, 2015 (Accession No. ML15072A106).
3. NRC Letter, *Supplemental Information Related to Request for Information Pursuant to Title 10 of the Code of Federal Regulations 50.54(f) Regarding Flooding Hazard Reevaluations for Recommendation 2.1 of the Near Term Task Force Review of Insights from the Fukushima Dai-ichi Accident*, dated March 1, 2013 (Accession Number ML13044A561).
4. NRC Letter, *Coordination of Requests for Information Regarding Flooding Hazard Reevaluations and Mitigating Strategies for Beyond-Design-Basis External Events*, dated September 1, 2015 (Accession Number ML15174A257).
5. Nuclear Energy Institute (NEI) Report, NEI 16-05, Revision 1, *External Flooding Assessment Guidelines*, dated June 2016 (Accession Number ML16165A178)
6. NRC Letter, *Oconee Nuclear Station, Units 1, 2, and 3 - Interim Staff Response to Reevaluated Flood Hazards Submitted in Response to 10 CFR 50.54(f) Information Request Flood-Causing Mechanism Reevaluation*, dated September 24, 2015 (Accession No. ML15239B243).
7. NRC Letter, *Oconee Nuclear Station, Units 1, 2, and 3 - Staff assessment of Response to Request for Information Pursuant to 10 CFR 50.54(f) Flood-Causing Mechanisms Reevaluation (CAC nos. MF1012, MF1013, and MF1014) and Path Forward on Confirmatory Action Letter*, dated April 14, 2016 (Accession No. ML15356A158).

Ladies and Gentlemen

On March 12, 2012, the NRC issued Reference 1 to request information associated with Near Term Task Force (NTTF) Recommendation 2.1 for Flooding. One of the required responses directed licensees to submit a Flood Hazard Reevaluation Report (FHRR). The final FHRR for Oconee Nuclear Station (ONS) was submitted on March 6, 2015 (Reference 2). The NRC stated

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in Reference 3 that it considers the reevaluated flood hazard to be "beyond the current design/licensing basis of operating plants."

The NRC issued Reference 4 to inform the industry that new guidance regarding flood hazard responses would replace existing integrated assessment instructions and would provide "a graded approach to flooding reevaluations and would provide for more focused evaluations of local intense precipitation and available physical margin in lieu of an integrated assessment."

The NRC has endorsed NEI 16-05, Revision 1 "External Flooding Assessment Guidelines." (Reference 5) which directs that for each flood-causing mechanism not bounded by a Design Basis (DB) flood (using only stillwater and/or wind-wave run-up levels), evaluations should follow one of the following five assessment paths:

Path 1: Demonstrate Flood Mechanism is Bounded Through Improved Realism,

Path 2: Demonstrate Effective Flood Protection,

Path 3: Demonstrate a Feasible Response to LIP,

Path 4: Demonstrate Effective Mitigation,

Path 5: Scenario Based Approach.

The required response for non-bounded flood-causing mechanisms assessed by Paths 1, 2, or 3 calls for performance of a Flooding Focused Evaluation. ONS had three flood causing mechanisms that were not bounded by a DB flood and used Path 2 for its Focused Evaluation assessment. The enclosure to this letter provides the ONS Flooding Focused Evaluation Summary Report which followed NEI 16-05, utilizing Appendix B and C for guidance to evaluate the site protection features.

The flooding analysis documented in References 6 and 7 were utilized as input to this Flooding Focused Evaluation. The Flooding Focused Evaluation reaffirms that the ONS has reliable, passive protection of Key Structures, Systems, and Components (SSCs) to maintain Key Safety Functions (KSFs) for the three flood causing mechanisms. ONS does not require human actions to protect Key SSCs, so an evaluation of the overall site response is not necessary.

This submittal completes the actions related to external flooding required by the Reference 1 letter.

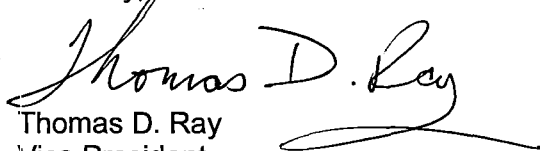
This letter contains no new or revised Regulatory Commitments.

Should you have any questions regarding this submittal, please contact Laura Todd with Oconee Regulatory Affairs, at (864) 873-6774.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 31, 2017

Sincerely,



Thomas D. Ray

Vice President

Oconee Nuclear Station

Enclosure:

Oconee Nuclear Station Flooding Focused Evaluation Summary Report

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cc:

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